Phone: (803: 737-0800)

DAN F ARNETT CHIEF OF STAFF

jnelson@regstaff.sc.gov

Jeffrey M. Nelson Counsel for ORS

VIA US MAIL

February 15, 2008

2006-227-6

PO. Box 11263

Charles L.A. Terreni, Chief Clerk/Administrator Joseph Melchers, General Counsel South Carolina Public Service Commission 101 Executive Center Drive Columbia, SC 29210

Re: Quarterly Reports of Piedmont Natural Gas Company

Dear Sirs.

It has come to our attention that Piedmont Natural Gas Company ("Piedmont") has been filing quarterly reports with the Public Service Commission ("Commission") for the past twenty-two (22) years in order to comply with a letter or directive issued by the Commission's former Director of Research, Mr. Glenn Rhyne, in October 1986. A copy of that letter is attached for your reference.

In light of the current filings required of Piedmont by other Commission Orders and Dockets, ORS has no need for this report. Additionally, representatives of Piedmont have indicated that the time and effort expended by the company in preparing these reports is substantial.

Based on the duplicative nature of the information contained in these reports, ORS would request that the Commission consider whether Piedmont should be required to continue to provide these reports to the Commission in the future. Should the Commission also conclude that these reports are unnecessary; ORS believes that it would serve the interests of both Piedmont and its customers to permit the company to discontinue this filing.

Please contact myself and Mr. Jefferies should you have any questions or concerns regarding this request and information.

James H. Jeffries IV, Esquire cc:



STATE OF SOUTH CAROLINA THE PUBLIC SERVICE COMMISSION

P. O. DRAWER 11649 COLUMBIA, SOUTH CAROLINA 20211

September 11, 1986

Mr. John Maxheim President Piedmont Natural Gas Company Post Office Box 33068 Charlotte, North Carolina 28233

Dear Mr. Maxheim:

I have been directed by the Commission to make a determination of the present cost of common equity for your company and certain other utilities under the Commission's jurisdiction. Under the directive, the Commission has requested that the cost of equity be reviewed at various times each year. Mr. Cecil A. Bowers, Chairman of the South Carolina Public Service Commission, wrote to you on September 10 concerning the directive and the subsequent request for information from the Commission staff.

I would like to request that the response to the information request be returned to my office no later than October 10, 1986. To comply with the directive from the Commission it will be necessary for your company to update the response to the information request each quarter. The updates should be submitted no later than January 10, April 10, July 10, and October 10 each year.

Thank you for your assistance in this matter. If you have any questions, please feel free to contact the Commission Staff.

Sincerely,

R. Glenn Rhyne, D. B. A.

Director of Research

RGR: kp

Enclosure

INFORMATION REQUEST

FOR

PIEDMONT NATURAL GAS COMPANY

SEPTEMBER 11, 1986

Instructions:

- 1. Please return the response no later than October 10, 1986.
- 2. File quarterly updates no later than January 10, April 10, July 10, and October 10 each year.
- 3. Return responses to:

Robert Glenn Rhyne, D. B. A.
Director of the Research Department
South Carolina Public Service Commission
Post Office Drawer 11649
Columbia, South Carolina 29211
(803) 737-5160

4. File total company (consolidated company) data for each question.

INFORMATION REQUEST

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- 1. The capital structure at the end of each calendar year for the last five (5) years and as it exists currently.
 - a. The class of capital (common, preferred, long-term debt, etc.).

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- b. The amount (in dollars) of each class.
- c. The ratio of each class of capital to the total capitalization of the firm.
- The end of this year and next year.
- and Poor's) for long-term debt.
 - b. Provide the current yield to maturity on the latest bond
- 4. Provide a projection of planned (anticipated or forecasted) issues of long-term and short-term debt and probable dates and amounts of issues for the company for the next two (2) (work away years.
 - a. For any long-term or short-term issuances planned during the next three months provide the currently anticipated yield or rate of interest.
- 5.√ Provide a listing of all common stock issues in the primary markets for the company over the past ten (10) years to the most recent showing the following:
 - a. date of issue
 - b. number of shares
 - c. par value of stock
 - d. price per share at time of issue
 - e. book value per share at time of issue
 - f. gross proceeds
 - q. net proceeds
 - h. common stock rating (Moody's and Standard and Poor's) at the time of each issue.

- i. the current rating on common stock (Moody's and $\eta_{\rm Mu}$) Standard and Poor's).
- 6. Provide a listing of all planned or anticipated issues of the common, preferred and preference stock for the next two (2) years, by approximate date and amount of issue (in dollars and number of shares) for the company.
- 7. a. Provide closing market price figures for the firm's common stock for each month of each calendar year for the past ten (10) years to the present for the company. ((()))
 - 1. Note and adjust market price for all stock splits and stock dividends by date and provide information as to type (example, two for one, etc).
 - b. Beginning three (3) years ago, list the monthly market volumes of common shares traded on the market.
 - c. Provide the closing weekly market prices for the company for each week over the last two calendar years and to present. (Adjust for splits, etc.)

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- 8. Ja. For each year for the past three years provide the amount of common equity (dollar amount and percent of total) that the company has obtained from external equity sources. (Those other than through retained earnings such as issuance of common equity in the market, reinvestment programs, etc.)
 - b. List the sources and the percent of the total common equity and actual dollar amount obtained from each external source.
- 9. Provide the latest company prospectus and annual report.
- Provide a copy of any financial reviews pertaining to the company which were conducted by financial analysts during the past three months. (This includes evaluations of common stock, earnings and dividend growth projections, etc.)
- Provide a listing for each calendar year for the past ten years and for the past twelve months ending with the most recent data available for the following:
 - a. book value per share
 - b. earnings per share
 - c. dividends per share
 - d. dividend payout ratio

			f.	return on total assets (average)		
			g.	total utility plant in service use "Completed Construction" #	, 15	
			h.	net utility plant in service		
			i	total operating income		
			j.	net income		
			k.	total plant construction expenditures	new	
			·:	administrative and general expenses	15	
			m.	operating expenses	,	
			n.	maintenance expenses)		
			٥.	total revenues from utility sales (revenue from services provided such as kilowatt-hours sold, dekatherms sold, etc.)		
j (s	12.	Provi	ide ne p	quarterly data for the past three calendar years and resent for the following: 1984, 1985		
			a.	average number of shares of common stock outstanding	Levy-	
			b.	dividends per share	Ļ	
			c.	net income	И,	
			đ.	total utility plant in service	49.0	
			е.	plant construction expenditures)	
			f.	total operating income		
			g.	earnings per share		
			h.	total revenues from utility sales	>	
η ('	13.	What year anti	fo	nnual rate of change (negative or positive) for each or the next two years does the company currently ate for the following items:		
			a.	total utility plant in service	1 13)
			b.	plant construction expenditures	West)	
			C.	administrative and general expenses	1 17	1

e. return on common equity (end of year and average)

ĉ.	total expenses from operation	1 18 Luces or militar		
٠.	total expenses from maintenance	-		
f.	net income	1 12		
g.	dividends per share	Jilay		
h.	earnings per share	tous		
l.	total revenues from utility sales	1 (8		